

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,	:	
<u>ex rel.</u> , THOMAS P. BURRIS,	:	
	:	<u>FILED UNDER SEAL</u>
Plaintiffs,	:	
	:	
v.	:	CIVIL NO. CCB-15-1443
	:	
THE SCRIPPS RESEARCH	:	
INSTITUTE,	:	
	:	
Defendant.	:	
	:	...o0o...

UNITED STATES' NOTICE OF INTERVENTION
FOR PURPOSES OF SETTLEMENT

The United States, Relator, and Defendant, The Scripps Research Institute ("TSRI"), have reached a settlement agreement to resolve this action. In light of this agreement, and for the purpose of effectuating and formalizing that resolution, pursuant to the False Claims Act, 31 U.S.C. §§ 3730(b)(2) and (4), the United States respectfully advises the Court of its decision to intervene in this action for the purposes of settlement. The parties have executed a settlement agreement resolving this case with no issues to remain before the Court. Under the terms and conditions of the settlement agreement among the parties, the United States and Relator will file a Notice of Dismissal following the settlement payment from TSRI.

Finally, the United States hereby requests that the Court unseal the Relator's Complaint, this Notice of Intervention, and all subsequent filings following this Notice of Intervention. The United States respectfully requests that all other filings in this matter remain under seal and not be made public (including, but not limited to, any applications filed by the United States for extensions of the sixty-day investigative period, any applications for partial lifting of the seal,

and any orders previously entered in this matter). A Proposed Order is filed herewith.

Respectfully submitted,

Jeffrey Bossert Clark
Acting Assistant Attorney General

Robert K. Hur
United States Attorney

By: /s/
Allen Loucks
Assistant United States Attorney
36 South Charles Street, Fourth Floor
Baltimore, Maryland 21201
(410) 209-4800

/s/
Jamie Ann Yavelberg
Patricia L. Hanower
Yolonda Y. Campbell
Attorneys, Civil Division
United States Department of Justice
P.O. Box 261, Ben Franklin Station
Washington, D.C., 20044
(801) 325-3360

Certificate of Service

I certify that on September 10, 2020 a copy of the foregoing Notice of Intervention was sent by email to:

(1) Vincent McKnight, Esq., Sanford Heisler Kimpel, LLP, 1666 Connecticut Ave., N.W., Suite 300, Washington, D.C. 20009.

(2) Sherrie R. Savett, Esq., Joy P. Clairmont, Esq., and Russell Paul, Esq., Berger & Montague, P.C., 1622 Locust Street, Philadelphia, PA, 19103.

(3) Mark Allen Kleiman, Esq., Law Office of Mark Allen Kleiman, 2907 Stanford Ave., Venice, CA 90292.

/s/
Allen F. Loucks
Assistant United States Attorney